

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE: Heather Diane Nitch aka Heather Diane Greathouse dba Do It the Write Way LLC</b> <b>Debtor(s)</b>	<b>BK NO. 18-22439 GLT</b>
<b>The Bank of New York Mellon, as Trustee for CIT Mortgage Loan Trust 2007-1</b> <b>Movant</b>	<b>Chapter 13</b>
<b>vs.</b>  <b>Heather Diane Nitch aka Heather Diane Greathouse dba Do It the Write Way LLC</b> <b>Respondent(s)</b>	<b>Hearing Date:</b>

**OBJECTION OF THE BANK OF NEW YORK MELLON, AS TRUSTEE FOR CIT MORTGAGE LOAN TRUST 2007-1 TO CONFIRMATION OF CHAPTER 13 PLAN**

The Bank of New York Mellon, as Trustee for CIT Mortgage Loan Trust 2007-1 (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. On August 09, 2018, Secured Creditor filed a secured proof of claim in the amount of \$68,199.28.
2. Debtor's Plan provides for payment in the amount of \$60,728.29 towards the claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$7,470.99 , and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.
6. Debtor(s) is/are delinquent in plan payments to the Chapter 13 Trustee in the amount of \$16,502.90.

WHEREFORE, the Secured Creditor, The Bank of New York Mellon, as Trustee for CIT Mortgage Loan Trust 2007-1, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: September 21, 2020

By: /s/ Brian Nicholas , Esquire  
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